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Office Of Air, Waste
And Toxics

March 29, 2013

Heather Valdez
Chemical Engineer
EPA Region 10
Office of Air, Waste and Toxics
1200 – 6th Avenue, Suite 900, AWT-107
Seattle, WA 98101

RE: Initial Notification – WSU Grimes Way Steam Plant (GWSP) RICE #1 & #2

Dear Ms. Valdez:

Washington State University (WSU) submitted the required Initial Notification to the Washington State Department of Ecology on November 2, 2010 (see the attached letter). It has recently come to our attention that the Environmental Protection Agency is the oversight agency for the RICE units so please accept this letter as our Initial Notification.

Per 40 CFR 63, Subpart ZZZZ 63.9(b)(2), WSU submits this initial notification for the GWSP natural gas fired Reciprocating Internal Combustion Engines (RICE) # 1 and 2 units.

Name and address of the owner or operator:

Washington State University
Facilities Operations
PO Box 641150
Pullman, WA 99164-1150

Address of the affected source:

Grimes Way Steam Plant
2245 Grimes Way
Pullman, WA 99164

Identification of the relevant standard or other requirement that is the basis of the notification and the source's compliance date:

40 CFR 63, Subpart ZZZZ; compliance date: October 19, 2013

Brief description of the nature, size, design, and method of operation of the source and an identification of the types of emission points within the affected source subject to the relevant standard of the types of hazardous air pollutants emitted:

The two (2) RICEs were manufactured by Cummins Power Generation, Model QSV81-G, fired on natural gas, capable of generating a nominal 1,100 kW of electrical power. Cylinder displacement = 5.0625 liters per cylinder.

The units are operated for recommended routine maintenance, auxiliary power generation and loss of electrical power events.

The units have an oxidation catalyst pollution control device on the effluent gas stream. The emission point for each unit is a 100 foot stack.

Based on the latest source test, carbon monoxide emissions from the units are below 0.67 ppmvd @ 15% O₂. The catalyst inlet temperature and the pressure drop across the catalyst are monitored. The catalyst inlet temperature is recorded every 10 seconds and the differential pressure is recorded every second.

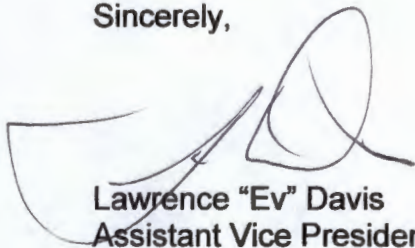
A statement of whether the affected source is a major source or an area source:

This is an area source.

Based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate and complete. If you have any questions about this report, please contact EH&S at 509-335-3041.

Thank you for your time and consideration.

Sincerely,



Lawrence "Ev" Davis
Assistant Vice President, Facilities Operations

attachment

pc: Dwight Hagihara
Mike Nearing
Marty O'Malley
Gene Patterson
Terry Ryan